

# **EXHIBIT J**

THOMAS SARANELLO

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN,	:	NO. 07CIV3769
Individually and on	:	
Behalf of All Other	:	
Persons Similarly	:	
Situated,	:	
Plaintiff	:	
	:	
vs.	:	
	:	
CITIGROUP, INC., and	:	
CITIGROUP TECHNOLOGY,	:	
INC.,	:	
Defendants	:	

DEPOSITION OF THOMAS G. SARANELLO

Taken in the Locks Law Firm, 110  
East 55th Street, 12th Floor, New York, New York, on  
Thursday, February 7, 2008, commencing at 11:30 a.m.  
before Sally A. Slifer, CSR, Registered Merit  
Reporter, Certified Realtime Reporter.

APPEARANCES:

LOCKS LAW FIRM

By: JANET C. WALSH, ESQ.

110 East 55th Street, 12th Floor

New York, NY 10022

-- For the Plaintiff

THOMAS SARANELLO

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APPEARANCES: (Continued)

MORGAN LEWIS

By: SARAH E. BOUCHARD, ESQ.

SARAH E. PONTOSKI, ESQ.

1701 Market Street

Philadelphia, PA 19103

-- For the Defendant

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1 don't talk about anything that was exchanged between  
2 attorneys.

3 Q. Did you talk to anybody at CitiGroup  
4 Technologies -- withdrawn.

5 When I refer to CitiGroup  
6 Technologies, is it okay if I use the term CTI?

7 A. Yes.

8 Q. Is that a term you use?

9 A. That's fine.

10 Q. What would you typically call -- refer to  
11 your employer as?

12 A. CitiGroup Technology Infrastructure.

13 Q. Is it commonly referred to as CTI or no?

14 A. Yes.

15 Q. To distinguish between CitiGroup and  
16 CitiGroup Technologies, Inc., I am going to refer to  
17 CitiGroup Technologies, Inc., as CTI, if that's okay  
18 with you.

19 A. That's fine.

20 Q. To the extent I say CitiGroup, I am referring  
21 to CitiGroup, Inc.

22 A. Okay.

23 Q. Did you speak to anybody at CitiGroup  
24 Technologies, other than what you already testified to  
25 with respect to coming to your deposition today?